

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) Case No. 4:14CR00187 JAR
vs.)
)
PAMELA TABATT,)
)
Defendant.)

MOTION TO CONTINUE SENTENCING HEARING

COMES NOW Defendant, PAMELA TABATT, by and through undersigned counsel, and for her request to continue the sentencing hearing presently set for Tuesday, June 21, 2016, hereby states to the Court as follows:

- 1) As this Court is undoubtedly aware, this matter has been set for sentencing to June 21, 2016 at 11:00 a.m.. *See Order*, on file with this Court.
- 2) As this Court has also been made aware via prior hearings, Defendant Tabatt suffers from a series of physical ailments requiring continued medical care, including that of a neurological nature. To that end, Defendant Tabatt has been a patient of Dr. Sudhir Batchu at the Columbia Center for Neurology for certain neurological issues identified by Counsel at the change of plea hearing. Defendant Tabatt is scheduled to visit Dr. Batchu on July 28th, 2016 for continued treatment, testing, and in anticipation of sentencing. In addition to other medical issues, Defendant Tabatt believes Dr. Batchu's treatment to relevant to this Court's sentencing determination as it may bear on her physical status. Accordingly, additional time is necessary to review and obtain salient medical records and to otherwise allow Defendant Tabatt an opportunity to continue treatment prior to sentencing.

3) Counsel for Defendant has contacted one of the assigned prosecuting attorneys, AUSA Erin Granger, who advised that her office would NOT object to this motion. For scheduling purposes, AUSA Granger provided the following exclusionary dates:

- **July 28th through August 1st, 2016**
- **August 4th through August 7th, 2016**
- **August 29th through September 2nd, 2016**

WHEREFORE, for the foregoing reasons, Defendant PAMELA TABATT, respectfully request this honorable Court grant her request to continue the sentencing hearing set for June 21, 2016 and thereafter reset this matter to a date certain in August, 2016 or as this Court's schedule permits.

Respectfully submitted,

/s/ John M. Lynch
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Attorney for Defendant Pamela Tabatt

Certificate of Service

I hereby certify that on May 17, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon:

Erin Grainger
James Delworth
Jennifer Winfield
Assistant United States Attorneys
Thomas F. Eagleton Courthouse, 20th Floor
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E/S John M. Lynch
John M. Lynch